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Attorneys for Plaintiffs
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
CIMONE NUNLEY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: February 19, 2020

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: May 11, 2020

Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated
6 herein and if called upon to testify, I could and would competently testify thereto, except as to
7 those matters that are stated upon information and belief.
8

9 2. Attached hereto and marked as Exhibit A are true and correct copies of various
10 excerpts from the deposition of Edward Romero. Defendant Tesla, Inc. (hereinafter "Defendant")
11 marked this document as "confidential" pursuant to the Protective Order and the document
12 should therefore be sealed pursuant to this Order.
13
14

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct. Executed on February 3, 2020 in San Anselmo, California.
17
18

19 DATED: February 3, 2020

20 By: 

21 Lawrence A. Organ, Esq.

22 Navruz Avloni, Esq.

23 J. Bernard Alexander, Esq.

24 Cimone A. Nunley, Esq.

25 Attorneys for Plaintiffs

26 DEMETRIC DI-AZ AND OWEN DIAZ
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